



Illinois Environmental Protection Agency • 2200 Churchill Road, Springfield, IL 62706

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CERTIFIED MAIL # P594561110

Refer to: 1990555010 - Williamson
Perma-Treat of Illinois
ILD063698971

EPA Region 5 Records Ctr.



386167

Compliance Inquiry Letter

July 3, 1986

Perma-Treat of Illinois
Attention: Rudy Bond
N. Carbon & Industrial Park Dr.
Morton, Illinois 62059

Dear Mr. Bond:

As Manager of the Compliance Assurance Unit for the Division of Land Pollution Control, it has come to my attention that your company may be in violation of the Illinois Environmental Protection Act or regulations adopted thereunder. More particularly, your company may not have complied with the 1985 Annual Hazardous Waste Reporting requirement of the State of Illinois for generators.

The Illinois Environmental Protection Act states that:

"No person shall conduct any hazardous waste storage, hazardous waste treatment, or hazardous waste disposal operation in violation of any regulations or standards adopted by the Board under this Act. . .". Ill. Rev. Stat., Ch. 111 1/2, par. 1021(f)(2).

"Conduct any process or engage in any act which produces hazardous waste in violation of any regulations or standards adopted by the Board under subsections (a) and (c) of Section 22.4 of this Act." Ill. Rev. Stat., Ch. 111 1/2 par. 1021(i)

"No person shall dispose, treat, store, or abandon any waste, or transport any waste into this State for disposal, treatment, storage, or abandonment, except at a site or facility which meets the requirements of this Act and of regulations and standards thereunder. . .". Ill. Rev. Stat., Ch. 111 1/2, Par. 1021(e).

35 Ill. Adm. Code 722.141 requires a generator who ships his hazardous waste off-site to submit Annual Reports to the Director of this Agency no later than March 1 for the preceding calendar year.



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Non-compliance with the annual reporting requirements of 35 Ill. Adm. Code 722.161 could be a violation of Ill. Rev. Stat., Ch. 111 1/2, pars. 1021(e), (f), or (i). Please note that the maximum civil penalty for such violations is set forth in Ill. Rev. Stat., Ch. 111 1/2, par. 1042(b)(5), which provides for a civil penalty not to exceed \$25,000 per day of violation. Also, the Environmental Protection Act provides for criminal fines and imprisonment as set forth in Ill. Rev. Stat., Ch. 111 1/2, Par. 1044.

The Illinois Annual Hazardous Waste Reporting requirements are designed to inventory hazardous waste generated, treated, stored, and disposed in Illinois. Because of the environmental importance of this program, any violation of the Annual Hazardous Waste Reporting system is reviewed with considerable concern. Our records indicate that on or about January 10, 1986 the Agency mailed copies of instruction booklets and blank forms to your company. The deadline for reporting was March 1, 1986 and to date no report has been received from your company.

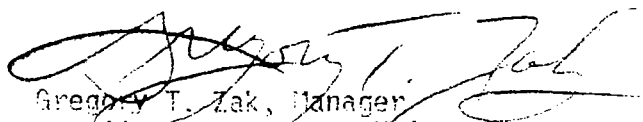
Within 15 days of the date of this letter please respond to the undersigned in writing explaining the reason for the delay, along with your completed 1985 Annual Hazardous Waste Report. Failure to respond will result in your being requested to attend a compliance conference at our Springfield Office.

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflicts which could lead to the filing of a formal action.

If you have any questions concerning this letter, please contact Hope Wright or myself at the above number.

Finally, this Agency expects your facility to insure that future violations will not occur.

Sincerely,


Gregory T. Zak, Manager
Compliance Assurance Unit
Compliance Monitoring Section
Division of Land Pollution Control

GTZ:HW:bjh/1395F/57.58

cc: Annual Report File
Southern - 7 Regional Office
Bruce Carlson, Regional Attorney